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FEB 02 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

_____)
In re: Equifax, Inc. Customer
Data Security Breach Litigation

) MDL Docket No. 2800
) Case No.: 1:17-md-2800-TWT
)
) CONSUMER ACTIONS
)

**APPLICATION FOR APPOINTMENT OF TROY N. GIATRAS TO THE
STEERING COMMITTEE FOR THE CONSUMER PLAINTIFF CLASS**

Troy N. Giatras (“Giatras”) of The Giatras Law Firm, PLLC respectfully applies to serve on the steering committee for the consumer plaintiff class in the above-captioned case. Giatras makes this application on behalf of his clients Rodd Santomauro; Brenda Birkett; and, Debra Lee (Case No. 17-5028) pursuant to Case Management Order (“CMO”) Nos. 1 (ECF No. 23) and 2 (ECF No. 87) and Federal Rules of Civil Procedure, Rule 23(g).

As Lead Counsel, Giatras recently prosecuted and was responsible for achieving the seminal appellate decision on standing in the *Chantal Attias, et al. v. CareFirst, Inc.*, 199 F. Supp. 3d 193 (D.D.C. 2016), *rev’d*, 865 F.3d 620 (D.C. Cir. 2017) data breach litigation, which established the strong consumer protection standard for data breach cases in the DC Circuit Court of Appeals. Giatras has also enjoyed the rare honor of arguing before the United States Supreme Court in *U.S. v. Hayes*, 555 U.S. 415 (2009). Presenting oral argument before the highest Court in the Nation is a profound and unique experience that strengthened his advocacy.

In further support of his application for a leadership role, Giatras provides as follows:

**I. COMPETITION AND DIVERSITY IN LEADERSHIP FOSTERS
BETTER RESULTS FOR THE VICTIMS OF THE DATA BREACH**

Competition and diversity in leadership on multidistrict cases improves results for clients. In *Monopolies in Multidistrict Litigation*,¹ Professor Elizabeth Chamblee Burch examines the appointment of leadership counsel in multidistrict litigation such as the instant matter. With empirical evidence it is revealed that a small number of lawyers statistically dominate the market for membership on plaintiff steering committees, for lead counsel, and for other leadership positions. The dominance of these large institutional repeat-players in securing leadership roles and supporting one another is empirically undeniable. Including capable experienced law firms such as the Giatras Law Firm in leadership roles is important for encouraging competition within the multidistrict litigation bar and will lead to positive results for clients.

Giatras submits an individual application because he and his firm are willing to serve the consumer class rigorously in a steering committee position. Lawyers with different backgrounds, from different regions of the country, bringing a different skillset to the table would form the strongest leadership slate. Virtually all of the individuals seeking leadership positions will have data privacy law experience, but how many of these candidates achieved a first-degree murder trial acquittal in 2017? Aside from class action data breach expertise, Giatras boasts three decades of successful civil and criminal litigation trial practice experience.

In his previous two trials, Giatras achieved acquittals where the client faced life in prison. Standing with a client, facing the jury, and receiving a judgment in a capital crime case provides invaluable experience that many attorneys will never know. Large-scale litigation,

¹ Elizabeth Chamblee Burch, *Monopolies in Multidistrict Litigation*, 70 VAND. L. REV. 67 (2017).

particularly in representing millions of individuals, can become faceless. Giatras understands that behind each client in this case there is an important victim of data breach requiring redress. Actual trial to verdict experience is invaluable and often overlooked in the multidistrict litigation selection process. Trial to verdict experience forces an attorney to face the toughest of odds, and to confront the visceral impact and pressures facing a client. The robust trial experiences of Giatras and his unique background allow him to bring distinct talents and expertise to the leadership team ultimately chosen by the Court. His primary goal is to provide the most excellent legal service to the plaintiff class and working collectively and efficiently with the team for the benefit of the clients. Giatras sincerely hopes that the Court allows him the opportunity to do so.

II. EXPERIENCE AND KNOWLEDGE OF APPLICABLE LAW

Giatras has extensive experience in numerous cases involving drug manufacturers, financial institutions, brokerage houses, insurance carriers, credit card companies, and, ancillary credit/financial products. Giatras is capable, qualified, and his life long experience in the law makes him able to offer unique perspectives in a leadership role. In addition to the notable experience below, Giatras' *curriculum vitae* is attached as Exhibit 1.

A. Most Relevant Data Breach and Consumer Class Action Experience.

Giatras is currently serving as Lead Counsel in the *Chantal Attias, et al. v. CareFirst, Inc.*, 199 F. Supp. 3d 193 (D.D.C. 2016), *rev'd*, 865 F.3d 620 (D.C. Cir. 2017) involving CareFirst's data breach of personal information. On August 1, 2017, the U.S. Court of Appeals for the District of Columbia issued a unanimous 3-judge ruling that customers of health insurance provider CareFirst have Article III standing to sue the company for a data breach that revealed personal information. The case arose from a breach at CareFirst, a major health insurance

company that exposed the sensitive personal information of over 1.1 million of its insureds.

Giatras' cutting-edge recent work as Lead Counsel in *CareFirst* is invaluable experience for prosecuting this case against Equifax. He has been and continues to be personally involved in every aspect of the *CareFirst* case, including strategy, brief writing, oral argument, discovery, working with experts, case management, attorney oversight, and settlement. He has worked hand in hand with other counsel regarding the many highly technical aspects of the case. Settling the law in a federal appellate circuit is only one of the reasons Giatras is qualified to serve on this Court's appointed leadership.

B. Other Cases

Giatras has had a long-standing passion for cases involving the rights of consumers, and his experience in privacy-related complex litigation goes far beyond data breach cases. Giatras has been active in class action, consumer fraud, data privacy, securities, antitrust, and other complex litigation, including serving as co-lead counsel, trial counsel, or as a member of various litigation committees in:

- *In re Vioxx Products Liability Litigation*, MDL No. 1657 (E.D., Louis.)
Represented numerous WV clients
- *In re Wal-Mart Wage and Hour Employment Practices Litigation*, MDL No. 1735, (D. Nevada). Represented the class of WV employees
- *In re Levaquin Products Liability Litigation*, MDL No. 08-1943 (D.C., Minn.)
Appointed to the Plaintiff's Steering Committee
- *Saratoga Advantage Trust v. ICG, Inc.*, (Security Frauds Action), Civil Action No. 2:08-cv-00111 (S.D.W.VA.). Served as local co-counsel
- *In re C.R. Bard, Inc., Pelvic Repair System Product Liability Litigation*, MDL No. 2187 (S.D.W.VA.). Represented individual clients as co-counsel
- *In re Boston Scientific Corp. Pelvic Repair System Products Liability Litigation*, MDL No. 2326 (S.D.W.VA.). Represented individual clients as co-counsel

- *James Coleman, et al. v. Union Carbide Corporation, et al.*, (Chemical Exposure/Medical Monitoring), Civil Action No. 2:11-cv-0366 (S.D.W.VA.)
Served as co-counsel for a West Virginia class
- *DP 2004 Merger Sub, LLC, successor in interest to PDC 2004-D Limited Partnership v. Christopher J. Rodenfels, Trustee for Christopher J. Rodenfels Revocable Trust*, (Shareholder Action). Served as lead counsel
- *Mary Glah, et al. v. Community Health Systems, Inc.*, Civil Action No. 2:14-cv-25783 (S.D.W.VA.). Lead WV class counsel in consumer healthcare data breach action.
- *Lisa Shiltz, et al. v. Anthem, Inc., et al.* (Consumer Healthcare; Data breach case), Civil Action No. 2:15-cv-4083 (S.D.W.VA.). Was one of the initial cases filed in this multi-district security data breach action.

Giatras has also been appointed a Special Assistant Attorney General representing the State of West Virginia in cases involving drug manufacturers, financial institutions, brokerage houses, insurance carriers, credit card companies, ancillary credit/financial products. Giatras has in the past and currently does represent the Attorney General in State of West Virginia against the following entities:

- *State of West Virginia, ex rel. Darrell V. McGraw, Jr., Attorney General v. Eli Lilly and Company*, Civil Action No. 3:06-cv-0298 (S.D. W.VA.); various state claims regarding the drug Zyprexa. The settlement resulted in the largest single settlement at that time for the State against a pharmaceutical company.
- *State of West Virginia, ex rel. Darrell v. McGraw, Jr., Attorney General v. Acordia of West Virginia, Inc. and Acordia, Inc.*, (Bid Rigging Case), Civil Action No. 05-C-115-W (Hancock Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Aegon Direct Marketing Services, Inc., et al.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-126-N (Mason Co., WV)
- *State of West Virginia, ex rel. Darrell V. McGraw, Jr., Attorney General v. Capital One Bank (USA) N.A., et al.*, Civil Action No. 10-C-7-N (Mason Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Center Partners Inc.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-123-N (Mason Co., WV)

- *Cross Country Bank and Applied Card Systems, Inc. v. Darrell v. McGraw, Jr., Attorney General of the State of West Virginia v. Rocco A. Abessinio, Individually and as an Officer of Cross Country Bank and Applied Card Systems, Inc.*, Civil Action No. 04-C-464 (Kanawha Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Intersections Insurance Services, Inc.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-122-N (Mason Co., WV)
- *State of West Virginia ex rel. Darrell V. McGraw, Jr., Attorney General v. Pfizer, Inc., et al.*, Civil Action No. 13-C-1-N (Mason Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Sitel Corporations*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-124-N (Mason Co., WV); and,
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Sykes Enterprises, Inc.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-125-N (Mason Co., WV).

C. Other Notable Recent Complex Litigation Achievements

- *Theresa L. Jenkins v. Element Federal Credit Union*, Civil Action No. 13-C-2252 (Kanawha Co., WV). Lead counsel in a consumer debt class collection action
- *Stacey F. McCown, et al. v. NGS, Inc., et al.*, Civil Action No. 3:14-cv-27719 (S.D.W.VA.). Lead counsel in complex consumer class litigation.
- *Jonathan Schaffer, et al. v. Sleepy Hollow Golf Club*, Civil Action No. 15-C-158 (Putnam Co., WV). Lead counsel in certified consumer class action litigation.
- *Christopher Sharpe, et al. v. National Collegiate Student Loan Trust 2005-1*. Lead counsel one of the first consumer class actions exposing abusive student loan debt collections conduct by NCSLT in the U.S.
- *Cavalry SPV I, LLC, as assignee of CAPITAL ONE BANK, N.A. v. Jeff Hughes, individually and on behalf of all others similarly situated*, Civil Action No. 16-C-904 (Kanawha Co., WV). Lead counsel in a consumer debt collection class action.
- *MAIA, LLC, doing business as VISITING ANGELS LIVING ASSISTANCE SERVICES v. ELAINE BROWN, individually and on behalf of all others similarly situated*, Civil Action No. 16-C-605 (Kanawha Co., WV). Lead counsel in a consumer breach of contract collection class action.

III. COMMITMENT TO THIS MASSIVE DATA BREACH CASE

Giatras understands the high-stakes of this massive data breach case. The historical data breach before this Court will require considerable time, effort, and analysis to litigate. Giatras is ready to work with other practitioners to fully prosecute and vindicate the rights of the harmed consumer class. Before the initial Status Conference on January 9, 2018, Mr. Giatras worked cooperatively with Attorney David Worley and others in preparation for Case Management Order #2. All performed their work in a collaborative manner with both efficiency and professionalism and their example should be the benchmark by which all future work should be calibrated in this case. After attending the Initial Status Conference on January 9, 2018, Giatras continued planning litigation strategies that will quickly and fairly move this critical case forward towards a positive result.

IV. ABILITY TO WORK WITH OTHER COUNSEL

In many of the cases described in Section II above, Giatras worked as part of a team of attorneys from other firms, whether in a leading or supporting role. He has an excellent track record of working with numerous law firms and diverse groups to obtain knowledge and information to assist with complex litigation, and bringing about global resolution. Giatras has repeatedly demonstrated his ability to work cooperatively and efficiently with other plaintiffs' counsel, in both lead and subordinate positions.

Further, Giatras values and demonstrates professionalism not only in his dealings with co-counsel, but with opposing counsel as well. He is well-regarded by the defense bar as an experienced and zealous advocate, but also a consummate professional. The highest compliment is when opposing counsel or client refers a new client, which frequently occurs. Giatras often collaborates with past and present opposing counsel on continuing legal education projects, MDL-

related think tanks, bar activities, and joint efforts to support the judiciary.

V. GIATRAS HAS BEEN AND CONTINUES TO BE WILLING AND ABLE TO COMMIT TO A TIME-CONSUMING PROCESS AND HAS ACCESS TO SUFFICIENT RESOURCES TO PROSECUTE THIS LITIGATION IN A TIMELY MANNER

As the founder of The Giatras Law Firm, PLLC, with nearly three (3) decades of complex and class action litigation behind him, Giatras well understands both the time and financial commitments that this type of high stakes litigation demands. He is also aware that the Court expects the litigation to move promptly and efficiently. He does not take these obligations lightly and would not ask the Court to appoint him on the steering committee unless he was certain he could meet these obligations. Without reservation, Giatras assures the Court that The Giatras Law Firm has both the staff and the financial resources to lead and manage this case promptly and efficiently to a successful conclusion.

The Giatras Law Firm is large enough for the case to be staffed appropriately, but modest enough to assure the Court that Giatras' approach to the case will be acutely aware of efficiencies and avoid any duplication of effort. Giatras is the sole owner of the law firm and since 1996 has been responsible for the financial management of the firm. It is important to use appropriate resources to get the job done, yet doing it efficiently since we are the guardians of the client's future recovery. The Giatras Law Firm has always promptly met its litigation fund assessment obligations in every case and can undoubtedly meet the human and financial resource commitments this case requires. Furthermore, Giatras has already demonstrated his commitment to the case and the plaintiff class over the past several months, as described in above. He has expended these significant efforts knowing that all of his time expended prior to appointment on the steering committee will not be remunerated.

VI. PROPOSAL REGARDING FEES


Giatras would implement contemporaneous billing guidelines and efficiency protocols, similar to those implemented in previous matters before this Court. Monthly bill reporting will be required from all counsel working on the case. If necessary, he will counsel attorneys who fail to comply with the implemented billing and efficiency protocols. Reporting of fees, submission of fee applications, and all other fee related matters would fully comport with Eleventh Circuit law and the mandates of this Court.

VII. CONCLUSION

Giatras thanks the Court for allowing him to participate in the selection process and for the Court's serious consideration. For all the foregoing reasons, Giatras respectfully requests that the Court appoint him on the steering committee for the consumer plaintiff class in this litigation. He will be attending the hearing on February 9th and will be happy to address any questions or concerns the Court may have.

DATED: February 1, 2018

Respectfully Submitted,


Troy N. Giatras, Esquire
The Giatras Law Firm, PLLC
118 Capitol Street, Suite 400
Charleston, WV 25301
(304) 343-2900 Phone
(304) 343-2942 Fax #
E-mail: troy@thewvlawfirm.com
WV State Bar ID No. 5602

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2018, I electronically filed the foregoing Application of Troy N. Giatras of The Giatras Law Firm, PLLC for Appointment to Plaintiffs Steering Committee with the Clerk of the Court through the CM/ECF system, that the interested parties in this action will be served through electronic mail, and that a courtesy copy will be served on Court chambers.

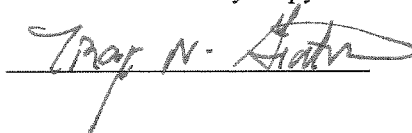


EXHIBIT 1

TROY N. GIATRAS

Office: 118 Capitol Street, Suite 400
Charleston, WV 25301

Phone: (304) 343-2900
Fax: (304) 343-2942
E-mail: troy@thewvlawfirm.com

Education: Duquesne University, Bachelor of Arts Degree; 1987

West Virginia University College of Law; JD; 1990
Order of the Barristers, Moot Court

Work Experience: January 2006 through present – Owner of the The Giatras Law Firm, PLLC, practicing in the areas of civil, consumer, criminal law, personal injury, arbitration, and mediation law.

1996 through January 2006 present- Founding partner of the law firm of Giatras & Webb, practicing in the areas of civil, insurance, domestic, criminal law, property & casualty litigation, government relations, arbitration, and mediation law.

1990 through 1996 - Associate; Huddleston, Bolen, Beatty, Porter & Copen; Charleston, West Virginia.

Admitted: West Virginia; District of Columbia; Pennsylvania; and Maryland; United States Supreme Court; United States District Court for the Southern and Northern Districts of West Virginia; United States Court of Appeals, Fourth Circuit; United States Court of Appeal for the Federal Circuit.

Achievements: AV Rated, Martindale-Hubbell

Argued before the United States Supreme Court
(November 2008)

Governor Appointment, WV Public Employees Insurance
Agency - 2007 to 2017

Governor Appointment, WV Parkways Authority Board
Serve on Finance and Facilities Committees – 2017 to Present

Appointed, WVU College of Law Visiting Committee

Board Member, American Red Cross, WV Chapter

Former Board Member, Ronald McDonald House,
Southern West Virginia

American Association for Justice, President's Club Member
and Elected West Virginia State Delegate Designee

Public Justice, Member and past West Virginia State Coordinator

Board Member, West Virginia Association for Justice (formerly WV
Trial Lawyer Association)

President, Western Trial Lawyers Association

National Association of Criminal Defense Lawyers, Life Member

National Association of Criminal Defense Lawyers, State of
West Virginia Membership Chair

Counsel to the Senate Minority Leader; Legislative Session
1997 to 1998; 1998 to 1999

American Association for Justice, Criminal Law Section,
Past Chairman

West Virginia State Bar, Member since 1990

American Bar Association, Member

Approved Mediator, US DC, SDWV

Rotary International, Member

Member, WVU College of Law Alumni Association

ATLA's Low Speed Impact Litigation Group, Past Chairman

Appointed, Fiduciary Commissioner, Kanawha County Probate

Appointed, Mental Hygiene Commissioner, Kanawha County

Appointed, Private Industry Council of Kanawha County

Appointed, Special Prosecutor, Kanawha County, WV

Appointed, Board of Zoning Appeals, Charleston, WV
Past Chairman

Former Board Member, the Leukemia and Lymphoma Society,
West Virginia Chapter

Member, Marshall University Thunder Club

Lectures:

Turn off Your Auto-Pilot: Autonomous Vehicles, Artificial
Intelligence & the Future of Auto Accident and Negligence Claims
(West Virginia Association of Justice Mid-Winter Convention 2018)

Five Secrets for David to Take on Goliath in The 21st Century
(Colorado Trial Lawyers Association)
(Western Trial Lawyers Association)

Adjusting the Automobile Injury Claim in WV
(National Business Institute)

Winning Strategies for Jury Selection
(National Business Institute)

Trying Soft Tissue Injury Cases in WV
(National Business Institute)

Effective Techniques for the Low Impact Collision Case
(WV Trial Lawyers Association)

Who, What, Where, When, Why & How: Everything You Need to
Know About Subpoenas (West Virginia Association for Justice)

Alcohol, Drugs & Impairment: How A Criminal Act Can
Impact Your Civil Case (Western Trial Lawyers Association 2010)
(American Association for Justice Annual Convention 2010)

Nuts, Bolts & Pitfalls of Infant Settlements
(West Virginia Trial Lawyer's Association)

Out of the Frying Pan and Into the Fire:
Starting Your Own Law Firm
(West Virginia Association for Justice Annual Convention 2009))

The Role of the Guardian Ad Litem in Summary Proceedings for
Infants and Protected Persons: Legal Assistants Program
(West Virginia Trial Lawyer's Association)

The Role of the Paralegal from Intake to Trial In Automobile Cases
(Association of Trial Lawyers of America)

Auto Collision Cases: New Approaches & Innovative Litigation
Strategies (Association of Trial Lawyers of America)

Advanced Personal Injury Practice in West Virginia

TROY N. GIATRAS

THE GIATRAS

LAW FIRM

P . L . L . C .

Mr. Giatras has been admitted to practice law since 1990, and has extensive experience as Special Assistant Attorney General representing the State of West Virginia in numerous pharmaceutical, financial industry and consumer *parens patraie* actions. Mr. Giatras also has extensive experience in civil litigation, class action, mass tort litigation, consumer finance, criminal defense, pharmaceutical, business torts, construction, criminal defense and appellate law.

The Giatras Law Firm attorneys are assisted by paralegals and experienced support staff. The firm has offices in Charleston, West Virginia and Cumberland, Maryland.

Aside from being appointed as Special Assistant Attorney General in high stakes litigation for the State, Mr. Giatras has presented oral argument before the United States Supreme Court impacting precedential law. Mr. Giatras is a 1987 graduate of Duquesne University and a 1990 graduate of the West Virginia College of Law. Mr. Giatras previously worked at the law firm of Huddleston, Bolen, Beatty, Porter & Copen practicing in the area of Civil Litigation defense. In 1996, Mr. Giatras established a firm concentrating in litigation.

Mr. Giatras is admitted in West Virginia; District of Columbia; Pennsylvania; and Maryland; United States Supreme Court; United States District Court for the Southern and Northern Districts of West Virginia; United States Court of Appeals Fourth Circuit; United States Court of Appeal for the Federal Circuit.

Troy Giatras has served as lead counsel, co-counsel, and local counsel in numerous high profile civil and criminal cases in both the State and Federal Courts. He has represented individuals and class members involving pharmaceutical drugs, Fen-Phen Diet Pill, Oxycontin, Vioxx, Baycol, Lipitor, Transvaginal Mesh, Levaquin, and Zyprexa. Mr. Giatras maintains an active trial practice in both State and Federal Court having been lead trial counsel in over 30 trials to verdict.

Mr. Giatras has an excellent track record of working with numerous law firms and diverse groups to obtain knowledge and information to assist with complex litigation, and bringing about global resolution.

In November of 2008, Mr. Giatras argued the respondent's case in *U.S. v. Hayes*, 555 U.S. 415 (2009) before the United States Supreme Court in Washington, D.C.

The Giatras Law Firm is fully equipped to handle complex and unique litigation and is devoted to commit the necessary time, resources and finances to this litigation.

The cases listed below are representative and does not identify each and every case handled, and certainly does not list the multitude of State and Federal negligence cases initiated and resolved since 1990.

Mr. Giatras has been appointed a Special Assistant Attorney General representing the

State of West Virginia in cases involving drug manufacturers, financial institutions, brokerage houses, insurance carriers, credit card companies, ancillary credit/financial products, in:

- *State of West Virginia, ex rel. Darrell v. McGraw, Jr., Attorney General v. Acordia of West Virginia, Inc. and Acordia, Inc.*, (Bid Rigging Case), Civil Action No. 05-C-115-W (Hancock Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Aegon Direct Marketing Services, Inc., et al.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-126-N (Mason Co., WV)
- *State of West Virginia, ex rel. Darrell V. McGraw, Jr., Attorney General v. Capital One Bank (USA) N.A., et al.*, Civil Action No. 10-C-7-N (Mason Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Center Partners Inc.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-123-N (Mason Co., WV)
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- *State of West Virginia ex rel. Darrell V. McGraw, Jr., Attorney General v. Pfizer, Inc., et al.*, Civil Action No. 13-C-1-N (Mason Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Sitel Corporations*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-124-N (Mason Co., WV)
- *State of West Virginia, ex rel Patrick Morrissey, Attorney General v. Sykes Enterprises, Inc.*, (deceptive ancillary credit card products to WV consumers), Civil Action No. 12-C-125-N (Mason Co., WV)

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- *In re Levaquin Products Liability Litigation*, MDL No. 08-1943 (D.C., Minn.)
Appointed to the Plaintiff's Steering Committee
- *In re Vioxx Products Liability Litigation*, MDL No. 1657, (E.D., Louis.)
Represented numerous WV clients.
- *In re Wal-Mart Wage and Hour Employment Practices Litigation*, MDL No. 1735, (D. Nevada). Represented the class of WV employees.
- *Saratoga Advantage Trust v. ICG, Inc.*, (Security Frauds Action), Civil Action No. 2:08-cv-0011 (S.D.W.VA.). Served as local co-counsel.
- *In re C.R. Bard, Inc., Pelvic Repair System Product Liability Litigation*, MDL No. 2187 (S.D.W.VA.). Represented individual clients as co-counsel.
- *In re Boston Scientific Corp. Pelvic Repair System Products Liability Litigation*, MDL No. 2326 (S.D.W.VA.). Represented individual clients as co-counsel.
- *James Coleman, et al. v. Union Carbide Corporation, et al.*, (Chemical Exposure/Medical Monitoring) Civil Action No. 2:11-cv-0366 (S.D. W.VA.). Served as co-counsel for a West Virginia class.
- *DP 2004 Merger Sub, LLC, successor in interest to PDC 2004-D Limited Partnership v. Christopher J. Rodenfels, Trustee for Christopher J. Rodenfels Revocable Trust*, (Shareholder Action), Civil Action No. 11-C-896 (Kanawha Co., WV). Served as lead counsel.
- *Mary Glah, et al. v. Community Health Systems, Inc.*, Civil Action No. 2:14-cv-25783 (S.D.W.VA.). Lead WV class counsel in consumer healthcare data breach action.
- *Lisa Shiltz, et al. v. Anthem, Inc., et al.* (Consumer Healthcare; Data breach case), Civil Action No. 2:15-cv-4083 (S.D.W.VA.). Was one of the initial cases filed in this multi-district security data breach action.
- *Cavalry SPV I, LLC, as assignee of CAPITAL ONE BANK, N.A. v. Jeff Hughes, individually and on behalf of all others similarly situated*, Civil Action No. 16-C-904 (Kanawha Co., WV). Lead counsel in a consumer debt collection class action.

- *Robert Hill and Mary Hill, his wife, et al. v. SCA Credit Services, Inc.*, Civil Action No. 5:14-cv-29565 (S.D.W.VA). Lead class counsel in a consumer debt collection action.
- *Theresa L. Jenkins, et al. v. Element Federal Credit Union*, Civil Action No. 13-C-2252 (Kanawha Co., WV). Lead counsel in a consumer debt class collection action.
- *MAIA, LLC, doing business as VISITING ANGELS LIVING ASSISTANCE SERVICES v. ELAINE BROWN, et al.*, Civil Action No. 16-C-605 (Kanawha Co., WV). Lead counsel in a consumer breach of contract collection class action.
- *Stacey F. McCown, et al. v. NGS, Inc., et al.*, Civil Action No. 3:14-cv-27719 (S.D.W.VA.). Lead counsel in complex consumer class action litigation.
- *Jonathan Schaffer, et al. v. Sleepy Hollow Golf Club*, Civil Action No. 15-C-158 (Putnam Co., WV). Lead counsel in certified consumer class action litigation.
- *Christopher Sharpe, et al. v. National Collegiate Student Loan Trust 2005-1*, Civil Action No. 15-C-158 (Kanawha Co., WV). Lead counsel one of the first consumer class actions exposing abusive student loan debt collections conduct by NCSLT in the U.S.

The Giatras Law Firm is uniquely positioned to this class action contributing regulatory enforcement experience.

The Giatras Law Firm will utilize its best and most efficient efforts as a team member on any level in this litigation.